

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>VS.</b>	§	<b>CRIMINAL NO.</b>
	§	<b>AU-18-00410(17)-RP</b>
<b>CARLOS ZAMUDIO</b>	§	

**UNOPPOSED MOTION TO CONTINUE**

**TO THE HONORABLE ROBERT PITMAN, UNITED STATES DISTRICT JUDGE:**

Defendant Carlos Zamudio files his written request to continue this case from its current trial date and would respectfully show:

1. Defendant was indicted on December 18, 2018 and charged with distribution of cocaine in violation of 21 U.S.C. § 841 (b)(1)(B).
2. Defendant has been released from custody under the supervision of U.S. Pretrial Services.
3. The Court has set the following schedule for the case: docket call on June 14 with jury selection and trial beginning on June 24.
4. Counsel for Mr. Zamudio is requesting a 60-90 day continuance in order to complete review of discovery, negotiate with the government and prepare for trial, if necessary. 90 days is probably more realistic in that on August 19, 2019 counsel is scheduled to start a preferentially set trial in the 277<sup>th</sup> District Court of Williamson County, Texas, *State vs. Shirley Rodriguez*, wherein Ms. Rodriguez is charged with over 30 counts of physical and sexual abuse of her children. The State's offer is 45 years. Settlement is not anticipated and trial will in all likelihood commence on

August 19 approximately 60 days from the current trial date in the instant case.

5. Counsel has conferred with Assistant United States Attorney Doug Gardner with regard to this motion and he is unopposed

For the foregoing reasons, Defendant prays that the Court grant this motion.

Respectfully submitted,

/s/ James R. Young

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#### **CERTIFICATE OF SERVICE**

I hereby certified that a true copy of the foregoing motion was served upon counsel for the United States as well as counsel for each co-defendant by using the Court's electronic filing system on April 28, 2018.

/s/ James R. Young  
JAMES R. YOUNG  
Attorney for Carlos Zamudio

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**ORDER ON MOTON FOR CONTINUANCE**

CAME ON to be heard Defendant Carlos Zamudio's unopposed motion for continuance, as said motion is hereby:

**(GRANTED)      (DENIED)**

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2019.

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HON. ROBERT PITMAN  
United States District Judge